

# Federal Defenders OF NEW YORK, INC.

Southern District  
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March 17, 2025

## Via ECF

The Honorable Ronnie Abrams  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The Court authorizes removal of Mr. Rosario's GPS monitoring bracelet to allow him to undergo the MRI procedure but the Probation Department shall reinstall it as soon as feasibly possible after completion of the procedure. On February 5, 2024, at the request of Probation, the Court extended Mr. Rosario's curfew to 1:30 a.m. for employment purposes only. The 10:00 p.m. curfew is to remain in effect for all other purposes. That curfew remains in place.

SO ORDERED.

Re: United States v. Pedro Rosario  
21 Cr 484 (RA)



Ronnie Abrams, U.S.D.J.  
March 18, 2025

Dear Judge Abrams:

Mr. Rosario has been on electronic monitoring for nearly two years now without incident. The defense writes to respectfully request the following bail modifications:

- 1) Mr. Rosario be permitted to remove his ankle monitor on March 18, 2025, and return it on March 19, 2025, for the purpose of his getting an MRI. Probation and the Government object to this schedule because they prefer this all be handled in one day, but because Mr. Rosario's appointment is in the late afternoon, it is not possible. Mr. Rosario will coordinate with his Probation Officer to ensure the monitor is off for as short a time as practicable.
- 2) Mr. Rosario be permitted to work past his Probation-set curfew of 10 PM. Mr. Rosario is employed by DoorDash and wants to work late-evening shifts because 1) he takes his child to school, does pick up, and then helps with homework and bedtime, making a day time shift difficult where DoorDash requires you sign up to drive for continuous multi-hour periods; and 2) working additional hours will ensure he meets the weekly hours requirement such that he will be entitled to the New York State-mandated minimum wage for "gig workers" that was put in effect last year. The Government and Probation object because they prefer Mr. Rosario drive during the day.

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Probation and the Government do provide a strong basis for the Court to deny these reasonable requests that will neither effect Mr. Rosario's return to Court or the safety of the community. The defense respectfully requests both be granted. Thank you for the Court's consideration.

Respectfully submitted,

  
/s/  
Ian Marcus Amelkin, Esq.  
(212) 417-8733

cc: AUSA Jerry Fang, Esq.